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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK \_\_\_\_\_X

ZIM INTEGRATED SHIPPING SERVICES, LTD.,

Case No. 07-civ-5861 (RMB)

Plaintiff,

- against -

BELCO RESOURCES, INC., SINOCHEM JIANGSU CORPORATION (FORMERLY KNOWN AS SINOCHEM JIANGSU IMPORT & EXPORT CORPORATION), NANJING **HUABIN FOREIGN TRADE & ECONOMICS** CO., LTD., DRAGONTRANS SHIPPING LTD. d/b/a HUABANG INTERNATIONAL, INC., SINOTRANS NINGBO INTERNATIONAL FORWARDING AGENCY CO., LTD., JOHN DOE 1-10,

AFFIRMATION IN SUPPORT OF PRAYER FOR MARITIME ATTACHMENT

Defendants.	
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VINCENT M. DE ORCHIS, having been duly sworn, hereby affirm as follows:

- 1. I am a member of DeOrchis, Wiener & Partners, LLP, attorneys for Plaintiff herein and admitted to practice before this Honorable Court,
- 2. This affirmation is submitted pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.
- I have attempted to locate the Defendants BELCO RESOURCES, INC., 3. SINOCHEM JIANGSU CORPORATION (FORMERLY KNOWN AS SINOCHEM

JIANGSU IMPORT & EXPORT CORPORATION), NANJING HUABIN FOREIGN TRADE & ECONOMICS CO., LTD., DRAGONTRANS SHIPPING LTD. d/b/a HUABANG INTERNATIONAL, INC., SINOTRANS NINGBO INTERNATIONAL FORWARDING AGENCY CO., LTD., within this District.

As part of my investigation to locate the Defendants within this District, I first 4. contacted the office of the New York Department of State, Division of Corporations, on June 19, 2006, via its official website at http://www.dos.state.ny.us and conducted a search for any corporation named "BELCO RESOURCES", "SINOCHEM JIANGSU CORPORATION", "SINOCHEM JIANGSU IMPORT & EXPORT CORPORATION", "NANJING HUABIN FOREIGN TRADE & ECONOMICS", "DRAGONTRANS SHIPPING LTD.", "HUABANG NINGBO INTERNATIONAL FORWARDING INTERNATIONAL", "SINOTRANS The search result indicated that SINOCHEM JIANGSU CORPORATION, AGENCY". SINOCHEM JIANGSU IMPORT & EXPORT CORPORATION, NANJING HUABIN FOREIGN TRADE & ECONOMICS, DRAGONTRANS SHIPPING LTD., HUABANG INTERNATIONAL, SINOTRANS NINGBO INTERNATIONAL FORWARDING AGENCY are neither New York corporations, nor are licensed, authorized or registered to do business in the State of New York as either domestic or foreign corporations. The search result also indicated that no active entity under the name of BELCO RESOURCES existed. However, an inactive domestic entity named BELCO RESOURCES INC., incorporated on January 14, 1974, was listed on the website. But Defendant BELCO RESOURCES, INC. appears to be an entity incorporated under the laws of North Carolina according to North Carolina Department of State and its president, James H. Wendling, is not the person listed under the inactive entry of the New York Department of State so that we can persuasively conclude that Defendant BELCO RESOURCES, INC. is neither a New York corporation, nor is licensed, authorized or registered to do business in the State of New York as either a domestic or a foreign corporation.

- I accessed, whenever available, each one of the Defendants' website 5. (www.belcoresources.com for BELCO RESOURCES; http://www.sinochemjiangsu.com/ SINOCHEM JIANGSU CORPORATION: http://www. english/sitemap/law.asp for nihuabin.com/en/index.asp for NANJING HUABIN FOREIGN TRADE & ECONOMICS CO., LTD., http://www.sinotrans-ningbo.com/english/eng/index-1.htm for SINOTRANS NINGBO) which indicated that these Defendants had their home office at the address mentioned in the First Amended Verified Complaint, but which did not mention or point in their websites to any presence within this District. Using the Google research engine, I was not able to find a website for Defendant DRAGONTRANS SHIPPING LTD. D/B/A HUABANG INTERNATIONAL, INC. but I was able to pull out information on websites (such as www.dragontrans.ecvv.com, www.bizearch.com/company/Dragontrans Shipping http://www.chinaenterprises.ru/Thematic Sections/Service/ Ltd. 13521.htm, ΟŢ Transportation/index006366.htm) indicating that this entity has only a presence in Ningbo, China.
- 6. I also reviewed the telephone company information directory maintained on the World Wide Web or Internet, as well as the white and yellow pages to determine if there were any listings for the Defendants in any of the counties within this District (e.g., Bronx, Dutchess, New York, Orange, Putnam, Rockland, Sullivan and Westchester) and did not find any listing for the Defendants.
- 7. I submit based on the foregoing that the Defendants cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, thus justifying issuance of an order of attachment against any property,

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goods, chattels or credits and effects of the Defendants as may be found within this District up to and including the amount of the claim as specified in the First Amended Verified Complaint.

I hereby confirm under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York

September 12, 2007

Vincent M. De Orchis, Esq. (VMD-6515)

W:1236-689N operation in Support of Rule B v. Belco, Sinochem et all/Amended ComplaintiZIM HATEA Attorney Affirmation in Support of Rule 8 Attachment 062007.00C